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May 10, 2011

VIA ELECTRONIC FILING

Honorable Michael A. Shipp, U.S.M.J.
UNITED STATES DISTRICT COURT - NEWARK VICINAGE
M.L. King, Jr., Federal Bldg. & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Chemas v. Sgt. Cannon, et al.
United States District Court for the
District of New Jersey - Newark Vicinage
Civil Action No.: 2:09-cv-01437-SRC-MAS
and
DeCosmis v. Township of Weehawken, et al.
United States District court for the
District of New Jersey - Newark Vicinage
Civil Action No.: 2:08-cv-05221-SRC-MAS

Dear Judge Shipp:

As you may recall, I represent defendant Weehawken police officers Neushwanter, Cannon, Majewski, and Saldarriaga with regard to the above captioned matters. Based on your recent rulings regarding various discovery disputes that occurred between the parties, factual discovery is continuing with the depositions of witness Luis Garcia having been taken on May 4, 2011, and the continuation of the deposition of plaintiff/defendant Richard DeCosmis scheduled to occur on May 13, 2011. In addition, the briefing on plaintiff DeCosmis' motion seeking leave to file a Second Amended Complaint naming as a new defendant Elise DiNardo, Esquire is scheduled to be completed by May 16, 2011.

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The current discovery schedule, however, calls for all parties' affirmative expert reports to be served by May 25, 2011. Because fact discovery is continuing, meeting the May 25 expert deadline is all but impossible. As such, it is requested by the parties, that the court hold a brief telephone conference to reset the expert discovery dates.

Our office would be happy to arrange for the call.

Respectfully submitted,

/s/ *Susanna J. Morris*

Susanna J. Morris

SJM:pg

cc: John T. Coyle, Esquire
David J. Montag, Esquire
Richard P. Cushing, Esquire
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